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October 26, 2017

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October 26, 2017
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Ms. Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001
Attn: Docket No. EP 742

Re: EP 742, Public Listening Session Regarding CSX Transportation Inc.'s
Rail Service Issues

Dear Ms. Brown:

I am Bruce Ridley, with Packaging Corporation of America. I testified at the CSX Listening Session on October 11th, and would like to point out what appear to be some misleading metrics in CSX's weekly reports to the Surface Transportation Board.

The examples in this letter were taken from CSX's October 17, 2017 report.

On page 4, On Time Arrivals, is based on yard-to-yard movements and do not account for first and last miles, which was an area of concern for shippers that testified at the session. Even at 64%, which is dismal for any supply chain, it can be expected to be much worse if the first and last miles are considered.

On page 6, regarding Train and Engine Headcount and Re-crew rate, the re-crew rate is only measuring a re-crew on the same train ID. It does not appear to count a train that died and did not re-crew because no crew was available. It also does not count a first or last mile switch crew that ran out of time even if a re-crew was done, etc. A more telling and accurate metric would be, how many re-crews in the system were needed and not filled.

On page 8, CSX states that they "Leveraged Avon as offset of increased volume flow through Russell, Columbus and Louisville" and "Dwell at these three locations down 48% from high point". CSX does not comment on current dwell at Avon, but PCA is currently having extremely high dwells of cars sitting there 7-14 days.

Lastly, on page 9, CSX reports its Weekly Car Orders and Normalized Fill Rate, and this fill rate is leveraged by the CSX metric calculation. The average car order number used is their 52 week average. CSX uses this average to cap the number of cars that can be ordered by customers and does not take into account any seasonality requirements or demands. As an example, when PCA ordered 14 cars at our Filer, MI facility from CSX, we were capped at 1 car and only received 1 car. Based on this fulfillment model, the CSX metric shows 100% car order filled, even though our requirements were nowhere close to being met. Also, based on our receipt of only 1 car, I understand that this is the number entered into the CSX 52 week average. Under this approach, the shipper cannot win. I also understand that this system was put in place because some shippers were ordering more cars than they need in the hope that they would actually get what they need.

To help resolve these car supply issues, PCA believes that a better metric would measure (i) how many cars were ordered, (ii) how many cars were delivered, and (iii) how many cars were loaded. These measurements would be more accurate and revealing as to the true car fulfillment by CSX. By collecting and reporting this data, CSX could identify those shippers who are over ordering and adjust their average to the number of cars loaded.

I thought it was important to relay this information since PCA is still having car supply issues with CSX. Accordingly, I urge the Board to address this problem by requiring CSX to adopt the car fulfillment metric proposed above. Also, PCA questions the propriety of CSX's decision to cap the number of cars that can be ordered, since it is too rigid and fails to take account of the dynamic markets of its customers. Further, it is unclear to me if the new car fulfillment caps are only being imposed on shippers of exempt commodities. Thank you for your consideration of these additional comments.

Sincerely,

Handwritten signature of Bruce Ridley in black ink, with the initials 'kab' written to the right of the signature.

Bruce Ridley
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cc: Ann D. Begeman, Acting Chairman
Deb Miller, Board Member

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